

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

AMSTED INDUSTRIES INC.

Plaintiff,

v.

BUCKEYE STEEL CASTINGS CO.

Defendant.

Case No. 01C3336

Judge Zagel

REGISTERED
OCT 25 2002

NOTICE OF MOTION

To: Gregory J. Vogler
Sharon A. Hwang
Sandra A. Frantzen
McAndrews, Held & Malloy, Ltd.
500 W. Madison St.
Chicago, Illinois 60606

And

Buckeye Steel Castings Co.,
Joe W. Harden, President and CEO, and
John R. Downes, Director of Engineering,
2211 Parsons Avenue,
Columbus, Ohio 43207

FILED
OCT 16 2002
MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

KINDLY TAKE NOTICE that on Thursday, October 24, 2002 at 10:15 a.m., Defendant Buckeye Steel Castings Company's attorneys shall appear before the Honorable James B. Zagel in the courtroom usually occupied by him, Room 2103, 219 South Dearborn Street, Chicago, Illinois 60603, and then and there present their

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Defendant's Motion Of Attorneys Shifley, Cooperman, Burow And Berghammer To
Withdraw, a copy of which accompanies this notice.

Date: Oct. 16, 2002

By: Charles W. Shifley
Charles W. Shifley
Marc S. Cooperman
Joseph A. Berghammer
Scott A. Burow
BANNER & WITCOFF, LTD.
10 South Wacker Drive
Suite 3000
Chicago, Illinois 60606
Telephone: (312) 715-1000
Facsimile: (312) 715-1234

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DOCKETED
OCT 25 2002

FILED
OCT 16 2002

MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

**MOTION OF PLAINTIFFS' ATTORNEYS SHIFLEY,
COOPERMAN, BUROW AND BERGHAMMER TO WITHDRAW**

The following attorneys for the defendant, Buckeye Steel Castings Company, move for leave of court to withdraw because good cause exists appropriate to a request for permission to withdraw: Charles W. Shifley, Marc S. Cooperman, Scott A. Burow, and Joseph J. Berghammer.

A condition exists appropriate to a request for permission of this tribunal to withdraw. Reasonable steps have been taken to avoid foreseeable prejudice to the rights of the client, including giving due notice to the client, and allowing time for employment of other counsel, as needed. Further, all materials in the possession of the undersigned will be retained and access provided according to law.

The attorneys also move for leave to submit documentation to the Court in camera if the Court wishes to see that the documentation justifies the motion, proves the good cause, and proves the steps taken to preserve the client's interests. The attorneys have moved to submit documentation in camera to preserve the attorney-client privilege of the client.

A memorandum supplements and supports this motion. Based on this motion and the memorandum, permission to withdraw is requested as moved, without need of in camera

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